

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ROBERT HOSSFELD, individually and on)	
behalf of a class of all persons and entities)	Case No. 1:20-cv-07091
similarly situated,)	
Plaintiff,)	
)	
v.)	Hon. Judge Joan B. Gottschall
)	Hon. Mag. Judge Sunil R. Harjani
ALLSTATE INSURANCE COMPANY,)	
Defendant.)	

**ALLSTATE INSURANCE COMPANY'S
STATEMENT OF ADDITIONAL MATERIAL FACTS**

Allstate Insurance Company ("Allstate") hereby submits the following Statement of Additional Material Facts pursuant to Local Rule 56.1.

Allstate Revised its Agency Standards on April 25, 2023: Insurance Agents May Only Use Contracted Vendors to Perform Live Call Transfer Telemarketing

1. Allstate maintains a do not call policy and an internal do not call list ("IDNC").
(**Exhibit A**, J. Heidrich Declaration at ¶6.)
2. Allstate makes its do not call policy available to the public upon request. (Ex. A, J. Heidrich Declaration at ¶7.)
3. Allstate also educates its Insurance Agents on its do not call policy and IDNC, and the proper handling of IDNC requests. (Ex. A, J. Heidrich Declaration at ¶8.)
4. Allstate maintains Agency Standards that include its do not call policy and practices and they are incorporated into Allstate's agency agreements. (Ex. A, J. Heidrich Declaration at ¶9.)
5. On April 25, 2023, Allstate updated its Agency Standards [REDACTED]

[REDACTED] (Ex. A, J. Heidrich Declaration
at ¶9; Updated Agency Standards attached as **Exhibit A-1**, at pp. 11-12.)

6. [REDACTED]
[REDACTED]

7. [REDACTED]
[REDACTED]

Respectfully submitted,

Dated: August 7, 2024

By: /s/ Rodney Lewis
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Allstate Insurance Company*

CERTIFICATE OF SERVICE

This is to certify that on August 6, 2024, I served the foregoing with the Clerk of the Court using the CM/ECF System, which will send electronic notification of such filing to all counsel of record.

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/s/ Rodney L. Lewis